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15 META COMPANY

16 META COMPANY, a Delaware corporation,

17 Case No. 3:17-cv-03259-EMC

18 Plaintiff,

19 **STIPULATED REQUEST AND
20 [PROPOSED] ORDER TO CONTINUE
THE CASE MANAGEMENT
CONFERENCE AND TO EXTEND ADR
DEADLINES**

21 v.

22 ZHANGYI ZHONG (a.k.a. Zhangyi "Johnny"
23 Zhong, a.k.a. Zhangyi "Kevin" Zhong), an
24 individual, DREAMWORLD USA INC., a
25 Delaware corporation, and DOES 1 through
26 20.

27 Defendants.

1 Pursuant to Local Rule 6-2 of the Northern District of California, Defendants Zhangyi Zhong
2 and Dreamworld USA Inc. (“Defendants”) and Plaintiff Meta Company (“Meta” or “Plaintiff”)
3 hereby make this stipulated request that the Court continue the case management conference
4 currently scheduled for September 14, 2017, as well as extend the deadlines for the Parties to file
5 the ADR Certification and Stipulation to ADR Process/Notice of Need for ADR Phone Conference.

6 WHEREAS, the Parties have tentatively resolved the above-captioned lawsuit (Deol Decl.,
7 ¶ 2);

8 WHEREAS, the Parties wish to avoid burdening the Court with a case management
9 conference while they are still working out the details of the tentative settlement (Deol Decl., ¶ 3);

10 WHEREAS a case management conference is currently scheduled for September 14, 2017;

11 WHEREAS a joint case management conference statement is due by September 7, 2017;

12 WHEREAS, the deadline to have filed the ADR Certification and Stipulation to ADR
13 Process/Notice of Need for ADR Phone Conference was August 17, 2017;

14 WHEREAS, there have been three previous extensions of time while the Parties have
15 endeavored to settle this matter (Deol Decl., ¶ 4);

16 WHEREAS, counsel for both Parties agree that the requested extension should not affect
17 any other deadlines in this case (Deol Decl., ¶ 5); and

18 WHEREAS, Civil Local Rule 6-2(a) of the Northern District of California states, “The
19 parties may file a stipulation ... requesting an order changing time that would affect the date of an
20 event or deadline already fixed by Court order, or that would accelerate or extend time frames set
21 in the Local Rules or in the Federal Rules.”

22 NOW, THEREFORE, in consideration of the foregoing, the Parties hereby stipulate and
23 request that:

24 (1) the September 14, 2017 case management conference be continued to October 26,
25 2017;

26 (2) the Parties be allowed to file their joint case management conference statement by
27 October 19, 2017; and

(3) the Parties be allowed to file the ADR Certification and Stipulation to ADR Process/Notice of Need for ADR Phone Conference by October 5, 2017.

IT IS SO STIPULATED.

6 || Dated: August 29, 2017

Respectfully submitted,

/s/ Rick C. Chang

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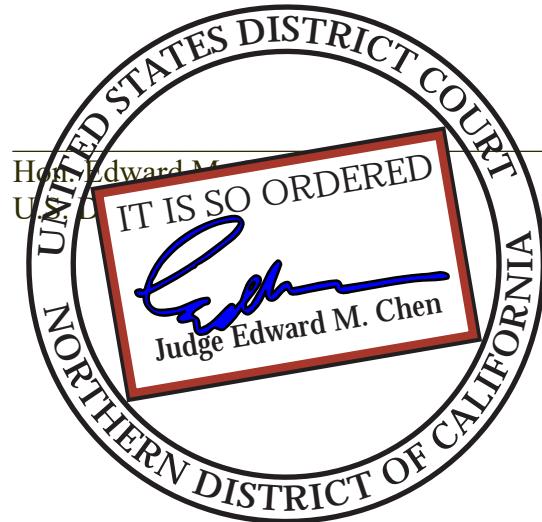
Counsel for Meta Company

1 **[PROPOSED] ORDER**
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3 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

4 CMC reset for 10/26/17 at 1:30 p.m. A joint CMC Statement shall
5 be filed by 10/19/17.
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7 Dated: _____ 8/31/17
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